

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:)	Case No.: 18-29042
Kathleen Rivecco)	
)	Chapter 13
)	
Debtor(s).)	Judge Jack B. Schmetterer

AMENDED NOTICE OF MOTION

To: Kathleen Rivecco, 626 Bryce Trail Roselle, IL 60172 ***via US Mail***
Tom Vaughn, Chapter 13 Trustee ***notice via ECF delivery system***
The United States Trustee ***notice via ECF delivery system***
The Trails Association Inc., c/o Raymond F. Polach, 1111 Plaza Dr, Suite 460,
Schaumburg, IL 60173 ***via US Mail***
Corona Investments, 120 N LaSalle St., Chicago, IL 60602, ***via US Mail***
Cook County Clerk's Office, Real Estate and Tax Division, 118 N Clark St. Room 434,
Chicago, IL 60602 ***via US Mail***
Cook County Treasurer's Office, 118 North Clark Street, Room 112, Chicago, IL 60602
via US Mail
See attached service list

On February 27, 2019 at 10:00 a.m. or soon thereafter as I may be heard, I shall appear before Bankruptcy Judge Jack B. Schmetterer or any other Bankruptcy Judge presiding at 219 South Dearborn, Courtroom 682, Chicago, Illinois 60604, and shall present the MOTION TO USE SELL OR LEASE PROPERTY 363(b) at which time you may appear if so desired.

/s/ David H. Cutler
David H. Cutler, esq.
Attorney for Debtor(s)
Cutler & Associates Ltd.
4131 Main St.
Skokie IL 60076
(847) 673-8600

CERTIFICATE OF SERVICE

The undersigned, an Attorney, does hereby certify that a copy of this Notice and Motion was filed AND sent electronically and via US MAIL to the above captioned by 6:00 p.m. on or before February 13, 2019

/s/ David H. Cutler
Attorney for Debtor(s)

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AMENDED MOTION TO USE SELL OR LEASE PROPERTY 363(b)

NOW COMES, the Debtor, Kathleen Rivecco (hereinafter referred to as “DEBTOR”), by and through her Attorneys, Cutler and Associates, Ltd., and moves this Honorable Court for entry of an Order Authorizing the Debtor to Use Sell or Lease her Real Estate Property, and in support thereof, respectfully represent as follows:

1. On October 16, 2018, the Debtor filed a petition for relief under Chapter 13 of the Bankruptcy Code.
2. Debtors Chapter 13 plan was confirmed on February 6, 2019.
3. The confirmed plan calls for monthly payments of \$634 per month for 60 months with general unsecured creditors receiving 100% of their timely filed or allowed claims.
4. The Debtor wishes to sell her real property located at 626 Bryce Trail, Roselle, IL 60172.
5. The Debtor has found a buyer and has entered into a contract for the sale of the Property. (Exhibit A)
6. The Debtors real estate property is paid in full and not encumbered with any mortgage loans.

7. Debtor owes back real estate taxes; those taxes will be paid for at closing.
8. The automatic stay has not been lifted on the real estate property.
9. Debtor will be paying off her Chapter 13 Bankruptcy with proceeds from the sale.

WHEREFORE, DEBTOR prays that this Honorable Court enter an Order Authorizing the Debtor to USE SELL OR LEASE PROPERTY 363(b) located at 626 Bryce Trail, Roselle, IL 60172.

Respectfully submitted,

By: /s/ David H. Cutler
David H. Cutler, esq.
Attorney for Debtor(s)
Cutler & Associates Ltd.
4131 Main St.
Skokie IL 60076
(847) 673-8600